

October 28, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Robocall Strike Force; Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, CG Docket No. 02-278

Dear Ms. Dortch:

On October 26, 2016, the following executives with PrivacyStar - John Ayers, Vice President, Corporate Development; Rob Sewell, Vice President, Products and Services; and Rob Piscopo, network engineering consultant, and I met with David Grossman, Chief of Staff to Commissioner Clyburn to discuss PrivacyStar's call blocking solutions, in light of the Robocall Strike Force Update briefing scheduled for the same day. On October 27th, the same PrivacyStar executives and I met with Legal Advisor Nick Degani of Commissioner's Pai office on the same Update, and PrivacyStar President Jeff Stalnaker, Mr. Ayers and I met with Commissioner O'Rielly and Legal Advisor Amy Bender on the same event.

PrivacyStar is a division of First Orion, a privately held company headquartered in Little Rock, with offices in Seattle, Dallas and London, UK. PrivacyStar has been providing consumers with the ability to customize the blocking of unwanted calls since 2008, and in fact developed a mobile application for use with a Blackberry before the advent of the iPhone in 2010. Today, PrivacyStar services approximately 20 Million subscribers primarily over Android devices, including through carrier partners, offering a free tier of blocking of fraudulent calls and a paid tier to customize the blocking of other categories of unwanted calls.

PrivacyStar's app also simplifies the reporting by consumers of complaints on unwanted calls, and is now a major source of data for the Federal Trade Commission's ("FTC") database on fraudulent and other unwanted calls. PrivacyStar provided the attached graphic showing that it is responsible for almost a third of the data in the FTC's Consumer Sentinel Network,¹ and the volume of complaints it facilitates through its consumer app continues to grow annually.²

Relative to the Strike Force, to which PrivacyStar was invited to provide comments both directly and through its carrier partners, PrivacyStar noted in the above-referenced meetings the positive

¹ Fed. Trade Comm'n, *Consumer Sentinel Network Data Book for Jan. – Dec. 2015* app. A2 (2016).

² *Id.* at app. A3.

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progress by the industry on STIR/SHAKEN protocol and framework and on Trust and Authentication. The Strike Force's concern for SS7 solutions aligns with PrivacyStar's approach to ubiquitous service, including over both wireless and wireline platforms. PrivacyStar is also pleased about the Strike Force's attention to Category Standardization and Next Gen Call Control Mechanics, which similarly align with its history in developing Call Management Services.

PrivacyStar welcomes the Commission's leadership in this area, and its recognition that industry should develop call-blocking standards. PrivacyStar agrees that the Commission should avoid technology mandates, as Commissioner O'Rielly noted at the Strike Force Update. Such a long-standing approach to letting the industry develop standards without governmental technology mandates will best support the competition that is already present with effective and customized call-blocking apps, to consumers' greatest benefit.

Respectfully submitted,



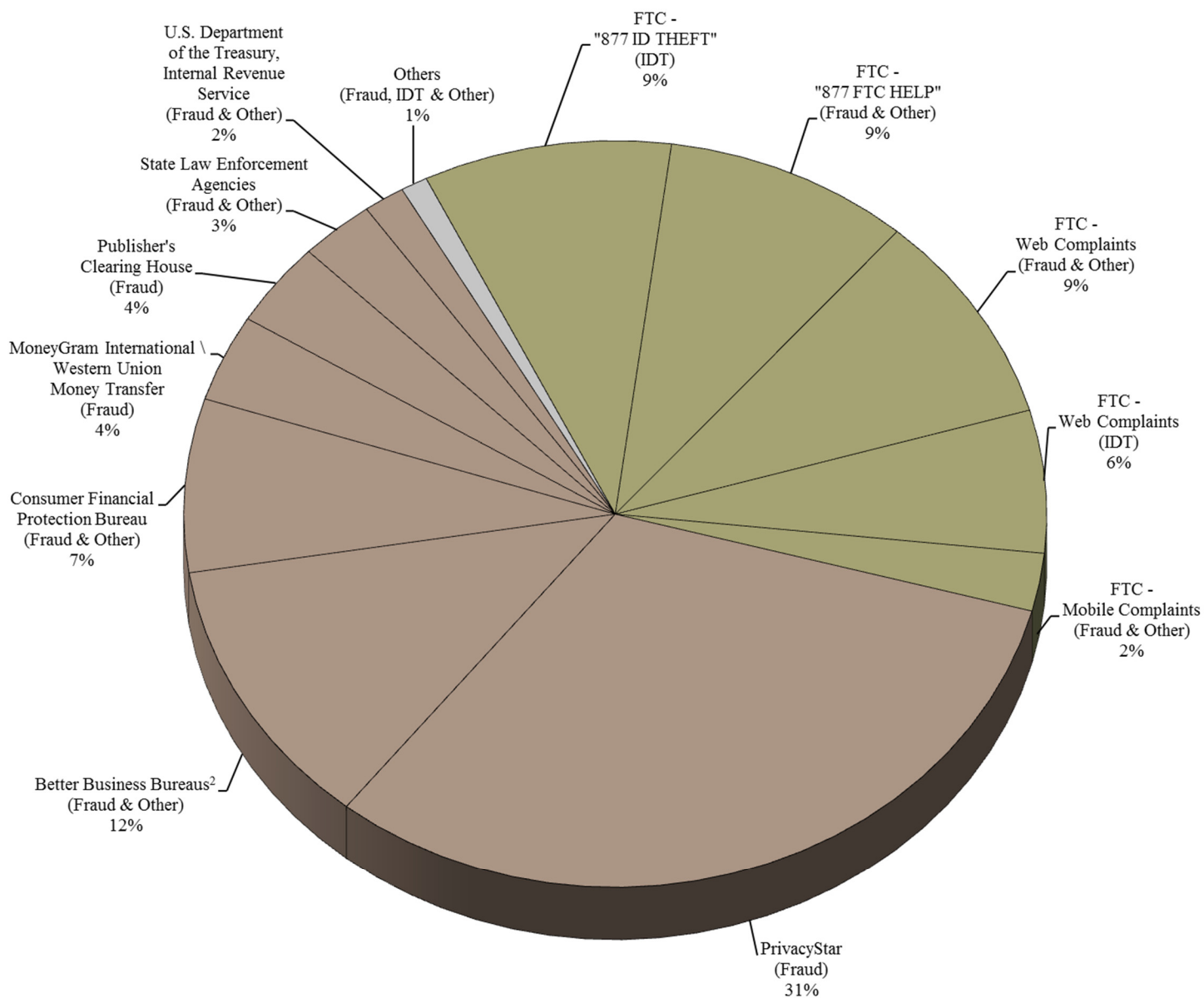
Patricia Paoletta
Counsel to PrivacyStar

Attachment: Pie Chart of FTC's Consumer Sentinel Network Major Data Contributors

cc: Edward Smith
David Grossman
Nick Degani
Amy Bender
Johanna Thomas
Lisa Hone

Consumer Sentinel Network Major Data Contributors¹

January 1 – December 31, 2015



¹Percentages are based on the total number of Consumer Sentinel Network complaints (3,083,379) received between January 1 and December 31, 2015. The type of complaints provided by the organization is indicated in parentheses.

²For a list of Better Business Bureaus contributing to the Consumer Sentinel Network, see Appendix A4.



Consumer Sentinel Network Data Contributor Details

January 1 – December 31, 2015

Data Contributors	CY - 2013		CY - 2014		CY - 2015	
	Complaints	Percentages ¹	Complaints	Percentages ¹	Complaints	Percentages ¹
FTC - "877 ID THEFT"	199,648	9%	229,826	9%	284,800	9%
FTC - "877 FTC HELP" (Fraud & Other)	220,186	10%	267,733	10%	283,040	9%
FTC - Web Complaints (Fraud & Other)	210,471	10%	210,071	8%	280,468	9%
FTC - Web Complaints IDT	71,731	3%	96,873	4%	188,576	6%
FTC - Mobile Complaints (Fraud & Other) ²	-	-	38,516	1%	76,678	2%
PrivacyStar	246,498	11%	540,198	21%	964,186	31%
Council of Better Business Bureaus ³	437,652	20%	406,346	15%	360,604	12%
Consumer Financial Protection Bureau	149,531	7%	218,804	8%	229,611	7%
MoneyGram International \ Western Union ⁴	65,935	3%	70,067	3%	115,325	4%
MoneyGram International	38,253	2%	41,027	2%	82,427	3%
Western Union	27,682	1%	29,040	1%	32,898	1%
Publishers Clearing House	56,653	3%	72,733	3%	111,713	4%
State Law Enforcement Agencies	88,012	4%	84,134	3%	85,720	3%
Ohio Attorney General	18,032	1%	15,290	1%	18,847	1%
North Carolina Department of Justice	16,360	1%	8,650	<1%	13,978	<1%
Washington Attorney General	11,789	1%	11,275	<1%	10,825	<1%
Massachusetts Attorney General	63	<1%	7,628	<1%	8,959	<1%
Maine Attorney General	4815	<1%	6,755	<1%	7,042	<1%
California Attorney General	11,239	1%	9,718	<1%	5,767	<1%
Indiana Attorney General	5,081	<1%	4,670	<1%	4,832	<1%
Michigan Attorney General	4,166	<1%	4,042	<1%	3,823	<1%
Oregon Department of Justice	5,557	<1%	4,498	<1%	2,514	<1%
Tennessee Division of Consumer Affairs	3,077	<1%	2,841	<1%	1,914	<1%
Iowa Attorney General	2,339	<1%	1,832	<1%	1,899	<1%
South Carolina Department of Consumer Affairs	757	<1%	2,446	<1%	1,716	<1%
Colorado Attorney General	829	<1%	1,237	<1%	1,096	<1%
Nevada Attorney General	264	<1%	423	<1%	661	<1%
Idaho Attorney General	855	<1%	660	<1%	448	<1%
Montana Department of Justice	745	<1%	659	<1%	445	<1%
Alaska Attorney General	295	<1%	262	<1%	376	<1%
Hawaii Office of Consumer Protection	86	<1%	641	<1%	297	<1%
Mississippi Attorney General	515	<1%	482	<1%	240	<1%
Louisiana Attorney General	1,148	<1%	125	<1%	41	<1%
U.S. Department of the Treasury, Internal Revenue Service	635	<1%	22,136	1%	64,043	2%
Others	395,457	18%	368,580	14%	38,621	1%
National Consumers League	6,798	<1%	9,470	<1%	10,506	<1%
Canadian Anti-Fraud Centre	17,272	1%	11,385	<1%	10,108	<1%
Green Dot	91,814	4%	106,353	4%	7,647	<1%
Lawyers' Committee for Civil Rights	10,930	1%	5,000	<1%	3,184	<1%
U.S. Department of Veterans Affairs	-	-	1,583	<1%	2,047	<1%
Canada Competition Bureau	2,477	<1%	1,750	<1%	1,252	<1%
Scam Detector	-	-	-	-	930	<1%
Los Angeles County Department of Consumer Affairs	726	<1%	931	<1%	810	<1%
Financial Fraud Enforcement Task Force	629	<1%	671	<1%	708	<1%
Iowa Clinton County Sheriff's Office	40	<1%	154	<1%	348	<1%
Nevada Department of Business and Industry	82	<1%	402	<1%	307	<1%
Privacy Rights Clearinghouse	126	<1%	317	<1%	220	<1%
U.S. Department of Education	59	<1%	217	<1%	144	<1%
U.S. Department of Defense	16	<1%	333	<1%	142	<1%
Xerox Corporation	-	-	12	<1%	116	<1%
Other Data Contributors	37	<1%	80	<1%	152	<1%
Identity Theft Assistance Center ⁵	17,741	1%	4,885	<1%	-	-
Internet Crime Complaint Center ⁵	246,710	11%	225,037	9%	-	-

¹Percentages are based on the total number of CSN complaints: CY-2013 = 2,175,355; CY-2014 = 2,629,987; and CY-2015 = 3,083,379.

²FTC - Mobile Complaint Assistant was activated in CY-2014.

³For a list of Better Business Bureaus contributing to the Consumer Sentinel Network, see Appendix A4.

⁴MoneyGram International provides the FTC certain types of complaints that Western Union does not, such as complaints from consumers outside the United States and information about additional transactions that MoneyGram has linked to a consumer fraud complaint after investigating the transaction and contacting the sender. In addition, this chart does not include Western Union complaints from December 2015.

⁵Identity Theft Assistance Center and Internet Crime Complaint Center stopped contributing complaints in CY-2015.